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GIGANEWS, INC. and LIVEWIRE SERVICES, INC.

17 UNITED STATES DISTRICT COURT  
18 CENTRAL DISTRICT OF CALIFORNIA  
19

20 GIGANEWS, INC., a Texas corporation;  
and LIVEWIRE SERVICES, INC., a  
21 Nevada corporation,

22 Plaintiffs,

23 v.

24 PERFECT 10, INC., a California  
corporation; NORMAN ZADA, an  
25 individual; and DOES 1-50, inclusive,

26 Defendants.  
27  
28

Case No.: 2:17-cv-05075-AB (JPR)

**INDEX CITATIONS TO  
DEPOSITION DESIGNATIONS,  
OBJECTIONS, AND COUNTER-  
DESIGNATIONS FOR USE AT  
TRIAL**

Pretrial Conf.: March 1, 2019  
Time: 11:00 a.m.  
Courtroom: 7B  
Trial Date: March 26, 2019  
Judge: Hon. André Birotte, Jr.

Plaintiffs Giganews, Inc. and Livewire Services, Inc. hereby provide the following index of citations to deposition testimony they intend to present as evidence at trial under Federal Rule of Civil Procedure 26(a)(3)(A).<sup>1</sup>

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<sup>1</sup> Defendants objected to witnesses in their entirety but did not provide objections or counter-designations to specific testimony. The mark [\*] indicates a witness to whom Defendants have objected.

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FENWICK & WEST LLP  
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13	121:17-124:1	150:5-150:17	192:25-194:24
14	124:2-126:13	150:18-155:13	194:25-199:25
15	126:14-128:18	155:25-157:22	201:11-202:3
16	129:3-130:10	158:3-159:10	202:10-203:5
17	131:21-133:15	159:11-159:17	203:14-204:8
18	133:16-134:10	160:5-160:22	205:10-205:18
19	134:12-136:22	160:23-162:20	206:14-207:19
20	136:23-137:19	162:23-164:8	208:13-208:16
21	137:20-139:5	167:3-167:12	208:17-212:18
22	140:7-140:12	167:17-168:21	213:7-217:3
23	140:15-141:5	168:22-170:19	221:23-222:16
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1	226:2-229:15
2	229:24-230:18
3	231:2-231:13
4	231:14-232:8
5	233:10-236:1
6	236:15-237:10
7	242:7-242:13
8	243:7-244:14
9	244:20-245:20
10	246:18-247:7
11	252:9-253:6
12	253:7-253:15
13	254:14-256:1
14	257:9-260:21
15	260:22-261:3
16	262:4-263:6
17	263:12-263:24
18	264:3-264:17
19	264:20-265:2
20	265:13-266:6
21	266:7-267:17
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Poblete, Melanie (7/17/2018)*		
7:13-7:21	62:10-62:15	106:22-107:17
32:25-33:8	62:20-62:23	108:6-109:10
33:19-34:2	64:17-64:23	109:17-110:3
40:21-40:25	70:2-70:13	110:18-111:16
41:1-41:9	72:17-74:6	111:17-112:16
41:10-42:2	75:15-75:23	112:17-113:17
42:7-42:16	77:9-77:18	117:4-117:14
42:17-42:20	79:15-80:19	118:2-118:23
43:23-44:1	81:9-81:20	121:13-122:2
46:1-46:2	82:13-82:22	123:1-123:5
48:5-48:22	83:17-84:7	138:12-142:2
50:25-51:19	84:25-85:13	168:1-169:3
52:9-52:16	85:23-86:13	170:5-170:13
55:5-55:9	86:24-87:10	170:16-170:16
58:19-59:6	87:21-87:23	171:20-172:15
59:11-59:13	88:4-88:13	172:17-172:22
59:22-60:3	88:23-89:2	175:18-176:10
60:15-60:18	91:25-92:13	176:11-176:20
60:23-61:7	93:13-93:24	178:5-178:24
61:15-61:17	96:9-96:25	180:20-181:13
61:18-62:2	101:6-101:23	182:5-184:22

184:9-184:14

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<b>Hersh, Bruce (7/18/2018)*</b>		
9:9-9:21	70:21-71:7	96:12-96:15
35:12-36:2	72:11-72:20	109:4-109:15
36:13-37:1	73:2-73:10	109:16-109:20
37:15-38:3	73:14-74:2	109:21-110:11
38:22-39:7	74:16-74:23	110:12-110:16
39:15-39:19	74:24-75:5	110:17-110:23
39:23-40:4	75:6-76:3	110:24-115:4
41:24-42:13	76:7-77:17	115:5-116:10
46:11-46:12	77:18-78:14	116:11-116:22
46:19-47:6	78:19-78:22	116:23-117:3
47:7-47:14	78:23-79:10	117:4-119:3
49:12-49:23	79:17-80:10	119:11-119:17
50:8-50:17	82:15-83:10	120:3-120:17
52:1-52:24	83:16-84:14	120:18-121:4
64:5-64:11	84:21-85:13	121:23-122:15
65:19-66:8	85:22-86:4	126:1-127:9
66:14-66:16	86:18-87:7	128:16-128:19
68:3-68:17	87:17-87:20	130:21-131:6
68:21-69:4	87:24-88:8	134:1-135:8
69:15-69:19	88:9-88:17	136:8-136:24
69:22-70:16	94:13-95:15	137:7-137:9

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138:17-139:6
139:12-139:25
143:24-144:19
147:9-148:16
149:4-149:8
149:9-152:4
155:3-155:4
155:16-155:18
156:23-157:10
158:20-158:23
159:4-160:18

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<b>Zada, Norm (10/31/2018)*</b>		
10:1-10:9	33:3-33:19	57:18-58:5
10:25-11:6	33:20-35:2	58:8-58:19
12:1-13:9	35:3-35:11	58:20-59:20
13:10-14:1	35:12-35:17	60:10-61:22
14:2-15:7	35:18-35:24	70:10-71:15
15:8-16:21	35:25-37:2	71:16-73:1
16:22-17:21	37:3-37:13	73:2-75:2
17:22-19:6	37:14-38:9	75:3-75:19
19:7-20:16	38:10-38:18	75:21-76:10
20:17-21:6	38:19-40:8	76:11-77:17
21:7-21:21	40:9-40:23	77:18-82:21
21:22-22:18	40:24-41:19	82:22-83:3
22:19-23:20	42:11-45:21	83:4-83:13
23:21-26:11	45:22-46:10	83:14-84:5
26:12-26:24	46:11-47:5	84:6-85:6
26:25-28:13	47:6-47:9	85:7-85:24
28:14-29:17	48:16-49:9	85:25-87:5
29:18-30:5	49:14-49:16	87:8-88:8
30:6-31:16	49:19-51:5	88:9-89:18
31:17-32:17	53:9-53:14	89:19-90:9
32:18-33:2	53:21-55:7	90:10-90:19

1	90:20-91:13	125:8-129:25
2	91:14-92:12	130:6-131:8
3	92:13-93:10	132:7-147:2
4	93:11-93:16	147:19-151:24
5	94:17-94:20	152:14-158:23
6	95:9-95:15	
7	95:25-96:10	
8	97:12-98:3	
9	98:4-102:12	
10	102:13-103:23	
11	103:24-105:11	
12	105:25-110:2	
13	110:3-110:18	
14	110:19-111:7	
15	111:9-111:18	
16	111:19-113:10	
17	113:11-113:18	
18	113:19-116:21	
19	118:11-119:16	
20	120:13-120:20	
21	120:21-121:21	
22	122:15-122:17	
23	124:15-125:7	
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Defendants Perfect 10, Inc. and Norman Zada have designated the following as deposition testimony they intend to present at trial. Plaintiffs object and provide counter-designations as follows:

Yokubaitis, Jonah (4/30/2014)		
Defendants' Designation	Plaintiffs' Objection	Plaintiffs' Counter-Designation
5:10-12	none	none
9:9-10:14	Irrelevant; 403; (9:19-10:14) vague	none
13:21-14:2	irrelevant; 403	12:22-13:20
15:15-16:12	irrelevant; 403	16:17-21
16:22-18:6	irrelevant; 403; lacks foundation/witness lacks personal knowledge	16:17-21
20:4-21:5	irrelevant; lacks foundation/witness lacks personal knowledge	21:9-21:10; 21:12
21:17-23:16	irrelevant; 403	none
23:22-24:14	irrelevant; 403	24:15-24:21
26:9-27:15	irrelevant; 403	25:16-25:20
28:17-23	irrelevant; 403; incomplete	28:14-16

Yokubaitis, Jonah (4/30/2014)		
Defendants' Designation	Plaintiffs' Objection	Plaintiffs' Counter- Designation
30:21-33:18	irrelevant; 403; (32:24-33:4) compound	30:13-30:13; 30:15- 30:15; 30:16-30:17; 30:20-30:20; 33:19-33:22
33:23-34:5	irrelevant; 403	34:6-34:14; 34:25-35:3; 43:11-44:4
35:4-11	none	35:12-15; 37:2-8
40:5-12-42:9	irrelevant; 403; (42:4-9) vague	none
42:21-24	irrelevant; 403; lacks foundation/assumes facts not in evidence	none
47:21-24	irrelevant; 403; vague and ambiguous	none
50:8-51:9	irrelevant; 403; (50:8-12) vague; (50:25-51:9) vague	none
54:3-57:3	irrelevant; 403; vague	57:4-5; 57:10-25
59:12-60:22	irrelevant; vague	none
65:15-19	irrelevant; 403	none
67:22-68:1	irrelevant; 403	none

Yokubaitis, Jonah (4/30/2014)		
Defendants' Designation	Plaintiffs' Objection	Plaintiffs' Counter-Designation
71:19-72:2	irrelevant; 403	none
76:20-21	incomplete; irrelevant; 403	75:15-76:19; 76:22-77:3
81:25-85:17	irrelevant; 403; (81:25-82:4) vague; (82:5-9) vague; (82:10-17) vague; (82:18-83:6) vague; asked and answered; (83:7-16) vague; asked and answered; (83:25-84:5) vague; (84:6-85:6) vague	none
91:17-22	irrelevant; 403	none
92:15-93:1	irrelevant; 403; vague; argumentative; subject to MIL on (c) allegations	none
96:6-8	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; vague; argumentative; incomplete designation	93:21-23; 94:1-6; 94:9-17; 94:20-95:2; 95:5-15
119:3-18	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; witness lacks personal knowledge; vague; argumentative	none

Yokubaitis, Jonah (4/30/2014)		
Defendants' Designation	Plaintiffs' Objection	Plaintiffs' Counter-Designation
120:8-121:11	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; witness lacks personal knowledge; vague; argumentative	none
130:16-21	irrelevant; 403; subject to MIL on (c) allegations; lacks foundation; witness lacks personal knowledge; vague; argumentative	130:15
143:8-17	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence	143:18-24
144:5-145:20	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; witness lacks personal knowledge; vague; argumentative	none
146:16-23	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; witness lacks personal knowledge; vague	none



Yokubaitis, Jonah (4/30/2014)		
Defendants' Designation	Plaintiffs' Objection	Plaintiffs' Counter-Designation
189:6-11	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; witness lacks personal knowledge; vague; argumentative	none
189:22-191:7	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence	none
191:24-192:8	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; witness lacks personal knowledge; vague; argumentative	none
200:18-203:2	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; witness lacks personal knowledge; vague; argumentative; incomplete hypothetical; assumes facts not in evidence	none
216:21-217:2	irrelevant; 403; subject to MILs on (c) allegations; vague	none

Yokubaitis, Jonah (4/30/2014)		
Defendants' Designation	Plaintiffs' Objection	Plaintiffs' Counter-Designation
218:3-219:4	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; witness lacks personal knowledge; vague; argumentative	none
230:7-231:10	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; witness lacks personal knowledge; vague; argumentative	none
234:14-22	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; witness lacks personal knowledge; vague; argumentative, calls for expert opinion/ legal conclusion	none
235:7-21	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; witness lacks personal knowledge; vague; argumentative, calls for expert opinion/ legal conclusion	none

Yokubaitis, Ron (1/23/2014)		
Defendants' Designation	Plaintiffs' Objection	Plaintiffs' Counter-Designation
6:8-11	none	none
10:16-11:19	irrelevant; 403; includes attorney colloquy 10:24-11:4	none
12:1-13	irrelevant; 403; (12:1-6) vague	none
31:2-35:12	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence	none
37:24-40:25	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence	none
41:10-41:23	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; incomplete hypothetical	41:24-25; 42:3-9

Yokubaitis, Ron (1/23/2014)		
Defendants' Designation	Plaintiffs' Objection	Plaintiffs' Counter-Designation
42:10-14	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation	42:3-9
46:2-7	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; asked and answered	44:6-45:10; 45:13-46:1
58:15-20	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; vague	58:21-23; 59:1-14; 59:17-60:2; 60:5-7; 60:10-16
65:18-22	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; vague	65:23-24; 66:2-7
79:1-19	irrelevant; 403; subject to MILs on (c) allegations; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence; calls for a legal conclusion	none

Yokubaitis, Ron (1/23/2014)		
Defendants' Designation	Plaintiffs' Objection	Plaintiffs' Counter-Designation
95:1-96:22	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence; (95:17-25) incomplete hypothetical; calls for legal conclusion; (96:1-22) incomplete hypothetical; calls for legal conclusion	none
101:13-102:6	irrelevant; 403	none

Yokubaitis, Ron (1/23/2014)		
Defendants' Designation	Plaintiffs' Objection	Plaintiffs' Counter-Designation
102:17-104:23	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence; (102:17-20) asked and answered; (103:2-104:3) vague; lacks foundation; argumentative; compound; assumes facts not in evidence; (103:2-104:20 irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence; (104:21-23) irrelevant; 403	none
108:2-109:10	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; witness lacks personal knowledge; vague; assumes facts not in evidence	none
110:11-25	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; vague	none

Yokubaitis, Ron (1/23/2014)		
Defendants' Designation	Plaintiffs' Objection	Plaintiffs' Counter-Designation
111:24-112:11	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; witness lacks personal knowledge; vague; calls for speculation	112:12-14
122:6-13	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence	none
123:22-124:15	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence	none
124:25-125:6	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence	none

Yokubaitis, Ron (1/23/2014)		
Defendants' Designation	Plaintiffs' Objection	Plaintiffs' Counter-Designation
127:1-21	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence	none
127:24-128:17	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; witness lacks personal knowledge; vague; argumentative	none
135:9-136:2	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation' (135:13-21) vague	none
176:5-177:1	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation / assumes facts not in evidence; (176:5-12) argumentative; calls for a legal conclusion; vague; (176:13-177:1) compound; vague; incomplete designation	177:2-9



Yokubaitis, Ron (1/23/2014)		
Defendants' Designation	Plaintiffs' Objection	Plaintiffs' Counter-Designation
183:8-14	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; vague; argumentative	183:15-21
191:25-192:5	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; witness lacks personal knowledge	192:6-12
194:9-12	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; argumentative	none
194:22-195:9	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; vague; argumentative	none
195:17-23	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; vague	195:24-196:3; 196:8-12
205:13-25	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; vague; argumentative	none

Yokubaitis, Ron (1/23/2014)		
Defendants' Designation	Plaintiffs' Objection	Plaintiffs' Counter-Designation
206:1-11	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; vague; argumentative; incomplete designation; calls for a legal conclusion; asked and answered	206:12-13; 206:14-15; 206:18-20
207:15-22	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; vague; argumentative	none

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Menking, Shane (3/22/2014)		
Defendants' Designation	Plaintiffs' Objection	Plaintiffs' Counter-Designation
5:10-13	none	none
9:17-19	none	none
22:7-24:1	irrelevant; 403; lacks foundation; witness lacks personal knowledge; designation includes attorney colloquy; (23:14-19) vague	none
26:3-27:24	irrelevant; 403; (27:15-27:24) vague	none
30:6-10	irrelevant; 403	none
34:6-35:2	irrelevant; 403; lacks foundation; vague	none
35:10-16	irrelevant; 403; vague	none
36:1-5	irrelevant; 403	none
38:7-39:12	irrelevant; 403; (38:7-25) vague; (39:7-12) vague	none
39:18-41:2	irrelevant; 403; vague; (40:10-18) lacks foundation; assumes facts not in evidence	none

Menking, Shane (3/22/2014)		
Defendants' Designation	Plaintiffs' Objection	Plaintiffs' Counter-Designation
42:13-43:15	irrelevant; 403	none
45:10-47:2	irrelevant; 403; vague	none
61:21-62:10	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation/assumes facts not in evidence; vague; argumentative; calls for legal conclusion	none
63:20-64:9	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence	none
64:22-66:12	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; assumes facts not in evidence (65:24-66:12) argumentative	none

Menking, Shane (3/22/2014)		
Defendants' Designation	Plaintiffs' Objection	Plaintiffs' Counter-Designation
67:7-17	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence	none
70:9-71:3	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence	none
73:15-74:5	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence	none
77:25-78:10	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence	none

Menking, Shane (3/22/2014)		
Defendants' Designation	Plaintiffs' Objection	Plaintiffs' Counter-Designation
81:5-19	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence	81:22-82:1
82:3-19	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence	none
88:11-16	irrelevant; 403; vague; witness lacks personal knowledge	none
96:3-14	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; witness lacks personal knowledge; vague	96:15
101:1-4	irrelevant; 403	none
116:23-117:4	irrelevant; 403	none
117:20-24	irrelevant; 403	none

Menking, Shane (3/22/2014)		
Defendants' Designation	Plaintiffs' Objection	Plaintiffs' Counter-Designation
120:7-121:11	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence	none
121:20-122:2	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; witness lacks personal knowledge; vague; argumentative; calls for speculation	none
130:4-11	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence; calls for legal conclusion	none
146:12-147:21	irrelevant; 403; vague; (147:3-8) calls for speculation	none

Rosenblatt, William (8/22/2014)		
Plaintiffs' Designation	Defendants' Objection	Defendants' Counter-Designation
6:8-13	none	6:14-15; 6:17-24
18:15-19:7	irrelevant; vague; lacks foundation; calls for speculation	none
21:11-22:9	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; witness lacks personal knowledge; vague; argumentative' (21:23-22:9) assumes facts not in evidence; incomplete hypothetical; calls for speculation	none
24:19-26:6	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation / assumes facts not in evidence; witness lacks personal knowledge; vague; calls for speculation; incomplete hypothetical	none
27:15-28:9	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation / assumes facts not in evidence; witness lacks personal knowledge; vague; calls for speculation; incomplete hypothetical; calls for legal conclusion; argumentative	none



Rosenblatt, William (8/22/2014)		
Plaintiffs' Designation	Defendants' Objection	Defendants' Counter-Designation
29:23-30:3	incomplete designation (no question designated); irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation / assumes facts not in evidence; witness lacks personal knowledge; vague; calls for speculation; incomplete hypothetical; calls for a legal conclusion	29:17-18
32:16-25	incomplete designation (no question designated); irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation / assumes facts not in evidence; witness lacks personal knowledge; vague; calls for speculation; calls for a legal conclusion	none
41:10-14	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation / assumes facts not in evidence; witness lacks personal knowledge; vague	none
44:24-45:13	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; vague; calls for a legal conclusion	none

Rosenblatt, William (8/22/2014)		
Plaintiffs' Designation	Defendants' Objection	Defendants' Counter-Designation
50:19-51:7	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation / assumes facts not in evidence; vague	none
64:17-65:4	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation / assumes facts not in evidence; vague	none
74:11-17	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation / assumes facts not in evidence; witness lacks personal knowledge; vague; incomplete hypothetical	none
76:19-24	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation / assumes facts not in evidence; witness lacks personal knowledge; vague; calls for speculation	none
77:12-21	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation / assumes facts not in evidence; witness lacks personal knowledge; vague; calls for speculation; argumentative	none

Rosenblatt, William (8/22/2014)		
Plaintiffs' Designation	Defendants' Objection	Defendants' Counter-Designation
109:14-125:21	irrelevant; 403; subject to MILs on (c) allegations; designation includes objections; (110:19-11:7) vague; lacks foundation /assumes facts not in evidence; (11:8-15) vague; lacks foundation /assumes facts not in evidence; (111:20-112:18) witness lacks personal knowledge; lacks foundation/assumes facts not in evidence; calls for legal conclusion; vague; (113:3-115:8) lacks foundation; vague; witness lacks personal knowledge; calls for lay opinion and legal conclusion; includes attorney colloquy; (115:9-19) witness lacks personal knowledge; vague; argumentative	none
115:23-116:23	irrelevant; 403; subject to MILs on (c) allegations; designation includes objections; duplicative designation; lacks foundation/assumes facts not in evidence; witness lacks personal knowledge; calls for a legal conclusion; calls for lay opinion; argumentative; vague; (117:13-118:5) lacks foundation /assumes facts not in evidence; incomplete hypothetical; vague; calls for speculation; (118:6-12) attorney colloquy; (118:13-20) lacks	none

Rosenblatt, William (8/22/2014)		
Plaintiffs' Designation	Defendants' Objection	Defendants' Counter-Designation
	foundation /assumes facts not in evidence; incomplete hypothetical; vague; calls for speculation; (119:3-10) vague; lacks foundation; (119:11-121:4) lacks foundation/assumes facts not in evidence; calls for speculation; vague; witness lacks personal knowledge; argumentative; (121:5-13) vague; (122:1-12) argumentative; lacks foundation; vague; calls for legal conclusion; witness lacks personal knowledge; (122:13-123:8) argumentative; lacks foundation; vague; misleading; witness lacks personal knowledge; (123:9-17) calls for speculation; incomplete hypothetical; (123:24-124:24) Lacks foundation/assumes facts not in evidence; vague; incomplete hypothetical; (124:25-125:21) Lacks foundation/assumes facts not in evidence; vague; incomplete hypothetical; compound; calls for legal conclusion	
135:12-136:5	irrelevant; 403; subject to MILs on (c) allegations; (135: 12-19) vague; (135:20-136:5) asked and answered; calls for legal conclusion; lacks foundation / assumes facts not in evidence	none

Rosenblatt, William (8/22/2014)		
Plaintiffs' Designation	Defendants' Objection	Defendants' Counter-Designation
148:1-16	irrelevant; 403; subject to MILs on (c) allegations; lacks foundation/assumes facts not in evidence; calls for legal conclusion; vague; argumentative	none
161:21-24	irrelevant; 403; subject to MILs on (c) allegations; lacks foundation/assumes facts not in evidence; calls for legal conclusion; incomplete designation	none
186:20-187:20	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation / assumes facts not in evidence; vague; calls for legal conclusion; (187:7-16) compound; (187:17-20) incomplete designation	none
201:6-202:4	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation / assumes facts not in evidence; vague; compound; argumentative; calls for legal conclusion; witness lacks personal knowledge	none

Rosenblatt, William (8/22/2014)		
Plaintiffs' Designation	Defendants' Objection	Defendants' Counter-Designation
203:7-21	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation / assumes facts not in evidence; vague; compound; argumentative; calls for legal conclusion; witness lacks personal knowledge; calls for lay opinion	none
206:14-207:8	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation / assumes facts not in evidence; vague; argumentative; calls for legal conclusion; witness lacks personal knowledge; calls for speculation	none
210:5-25	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation / assumes facts not in evidence; vague; calls for legal conclusion	none
219:15-18	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation / assumes facts not in evidence; vague; compound; argumentative; calls for legal conclusion; incomplete designation	none

Rosenblatt, William (8/22/2014)		
Plaintiffs' Designation	Defendants' Objection	Defendants' Counter-Designation
224:2-229:16	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation / assumes facts not in evidence; vague; compound; argumentative; calls for legal conclusion; witness lacks personal knowledge	none
230:5-12	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; witness lacks personal knowledge; vague; argumentative, calls for nonexpert opinion/ legal conclusion	none
231:1-233:2	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; vague; argumentative; includes attorney colloquy	230:22-25; 233:3-4; 233:8-12
233:13-18	irrelevant; 403; subject to MILs on (c) allegations; lacks foundation; vague; argumentative, assumes facts not in evidence	233:19-24

<b>Molter, Philip (3/20/2014)</b>		
<b>Plaintiffs' Designation</b>	<b>Defendants' Objection</b>	<b>Defendants' Counter-Designation</b>
5:8-10	none	none
7:15-8:3	none	8:4-9:8
13:14-15	irrelevant; 403; incomplete designation	none
38:2-3	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation	none
42:1-8	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; calls for lay opinion; vague	none
44:12-45:6	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; calls for legal conclusion; witness lacks personal knowledge.; vague	none
47:2-20	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; vague; incomplete designation	47:21-23; 48:1-7; 48:8; 48:11-15; 48:18-49:3; 49:6-9; 49:25-50:2; 50:5-13



<b>Molter, Philip (3/20/2014)</b>		
<b>Plaintiffs' Designation</b>	<b>Defendants' Objection</b>	<b>Defendants' Counter-Designation</b>
51:25-52:6	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation	none
63:22-65:6	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; vague; argumentative	none
95:17-23	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; vague; calls for speculation	none
101:16-102:10	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; vague; misstates testimony	none
105:22-106:16	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; vague	105:10-21; 106:17-19
121:2-6	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; vague; calls for legal conclusion	none

Molter, Philip (3/20/2014)		
Plaintiffs' Designation	Defendants' Objection	Defendants' Counter-Designation
122:25-127:10	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; vague; argumentative; (123:14-18) misstates testimony; (124:19-124:3) calls for legal conclusion; (125-20-126:1) incomplete hypothetical; (126:12-22) asked and answered	none
129:6-14	irrelevant; 403; subject to MILs on (c) allegations; calls for privileged information	129:15; 129:16-130:5; 130:6-10
130:11-20	irrelevant; 403; subject to MILs on (c) allegations; lacks foundation; vague; argumentative	none
131:5-13	irrelevant; 403; subject to MIL on (c) allegations; lacks foundation; vague; argumentative	none
131:24-132:17	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; vague	132:18-19; 132:22-24

Molter, Philip (3/20/2014)		
Plaintiffs' Designation	Defendants' Objection	Defendants' Counter-Designation
135:13-142:24	irrelevant; 403; subject to MILs on (c) allegations; lacks foundation; witness lacks personal knowledge; vague; (136:15-20) argumentative; (136:21-137:3) argumentative, calls for legal conclusion; assumes facts not in evidence	none
150:2-14	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; vague; argumentative	none
166:15-167:10	irrelevant; lacks foundation / assumes facts; vague	none
169:25-171:25	irrelevant; 403; subject to MILs on (c) allegations; lacks foundation; witness lacks personal knowledge; vague; argumentative, calls for expert opinion / legal conclusion; (170:11-18) misstates testimony; (171:11-18) incomplete hypothetical; calls for speculation	none

Molter, Philip (3/20/2014)		
Plaintiffs' Designation	Defendants' Objection	Defendants' Counter-Designation
173:23-177:4	irrelevant; 403; subject to MILs on (c) allegations; lacks foundation; witness lacks personal knowledge; vague; argumentative; (174:25-175:12) misstates testimony; calls for speculation; lacks foundation; (175:13-20) misstates testimony; calls for speculation; lacks foundation; (175:21-176:10) misstates testimony; calls for speculation; lacks foundation	none
193:5-195:10	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; (193:23-194:13) asked and answered; argumentative; (194:5-13) argumentative; (194:14-195:2) argumentative; (195:3-10) calls for speculation	none
201:21-202.3	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; argumentative; asked and answered	none

Molter, Philip (3/20/2014)		
Plaintiffs' Designation	Defendants' Objection	Defendants' Counter-Designation
203:16-23	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation / assumes facts not in evidence; vague; argumentative; calls for legal conclusion; incomplete designation	203:24-204:1

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ATTORNEYS AT LAW

<b>Molter, Philip (3/21/2014)</b>		
<b>Plaintiffs' Designation</b>	<b>Defendants' Objection</b>	<b>Defendants' Counter-Designation</b>
37:9-23	irrelevant; 403	36:20-22; 37:3; 37:4; 37:6-8; 38:1
48:3-16	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; vague; argumentative; calls for legal conclusion	none
67:5-12	irrelevant; 403; subject to MILs on child pornography, (c) allegations and (c)s not owned by P10; lacks foundation /assumes facts not in evidence; vague	none
117:12-29	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence	none
118:5-19	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence	118:21-22

<b>Molter, Philip (3/21/2014)</b>		
<b>Plaintiffs' Designation</b>	<b>Defendants' Objection</b>	<b>Defendants' Counter-Designation</b>
142:25-143:10	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; vague; argumentative; asked and answered	none
145:13-146:3	irrelevant; 403; argumentative; lacks foundation; vague	none
148:19-151:6	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; calls for privileged information	none
153:20-158:10	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by Perfect 10; lacks foundation; witness lacks personal knowledge; vague; argumentative; assumes facts not in evidence; calls for privileged information	none
161:11-162:2	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; vague; argumentative	none
165:17-23	irrelevant; 403; subject to MILs on (c) allegations and (c)s not owned by P10; lacks foundation; vague	none

1 Dated: February 8, 2019

FENWICK & WEST LLP

2  
3 By: /s/ Todd R. Gregorian  
4 Todd R. Gregorian

5 Attorneys for Plaintiffs/Judgment Creditors  
6 GIGANEWS, INC., and LIVEWIRE  
7 SERVICES, INC.  
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